

1 (2) Pages
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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA**

10 In re:) Case No: 18-13252-A-13
11 JENNIFER SILVA) Chapter 13
12)
13) DC No.: SL-2
14 Debtor(s)) Date: November 01, 2018
15) Time: 9:00 a.m.
16) Dept.: A
17) Place: Courtroom 11, 5th Floor
18) 2500 Tulare St.
19) Fresno, California 93721
20) Judge: Honorable Fredrick E. Clement

MOTION TO VALUE COLLATERAL OF SN SERVICING CORPORATION

TO: SN SERVICING CORPORATION.

You are hereby notified that the debtor(s), under 11 U.S.C. section 506(a) and (d), Federal Rule of Bankruptcy Procedure 3012, General Order No. 05-03, as amended by General Order No. 06-01, paragraph 3(b), Zimmer v. PSB Lending Corp. (In re Zimmer), 313 B.R. 1220 (9th Cir. 2002) and Lam v. Investors Thrift (In re Lam), 221 B.R. 36, 40-41 (B.A.P. 9th Cir. 1997), will, and does, move this court for an order: 1) valuing the property described in the motion to value collateral attached to the debtor(s)' chapter 13 plan at the value in the motion; 2) determining that this creditor's claim is wholly unsecured; 3) treating this creditor's claim as an allowed general unsecured claim provided for under the chapter 13 plan. Absent a timely setting of hearing and a procedurally proper objection, the court may confirm the chapter 13 plan and grant the motion(s).

1 to value collateral and avoid lien(s) without a hearing. The chapter 13 plan and Schedule A are
2 attached to the exhibits supporting this motion, and incorporated by reference into this motion.

3 WHEREFORE, the debtor(s) pray(s) that:

- 4 1) the court value the collateral of SN Servicing Corporation, at the amount set forth
5 in the chapter 13 plan, and Schedule A;
- 6 2) the court determine that this creditor's claim is wholly unsecured
- 7 3) deem this creditor's claim as an allowed general unsecured claim provided for
8 under the chapter 13 plan; and
- 9 4) for any relief that this court deems just and proper.

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13 Dated: 10-3-18

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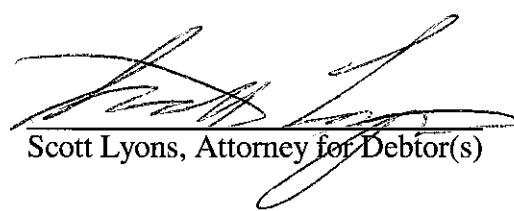
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A handwritten signature in black ink, appearing to read "Scott Lyons". It is written over a horizontal line and includes a stylized flourish at the end.

Scott Lyons, Attorney for Debtor(s)